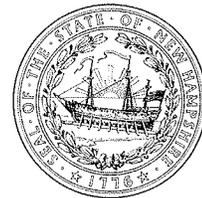


The State of New Hampshire
Department of Environmental Services

Thomas S. Burack, Commissioner

*Celebrating 25 Years of Protecting
New Hampshire's Environment*



January 23, 2013

The Honorable Candace Bouchard, Chairman, and Members of the Committee
House Transportation Committee
Legislative Office Building, Room 203
Concord, NH 03301

RE: HB 196 – relative to weight of commercial vehicles with idle reduction devices

Dear Chairman Bouchard and Members of the Committee:

The Department of Environmental Services (DES) supports House Bill 196, which proposes increasing the weight exemption for idle reduction technologies, thereby further promoting the use of such technology in commercial vehicles, resulting in reduced fuel use and emissions. However, DES recommends harmonizing the proposed weight exemption with current federal law. HB 196 currently proposes exempting up to 800 pounds for auxiliary power units or other idle reduction devices. DES feels the trucking community would be better served by consistency and certainty for drivers who bring goods to and through New Hampshire and recommends harmonizing with the current federal exemption of 550 pounds to avoid non-compliance with federal law.

Heavy duty trucks, and in particular long haul trucks, tend to idle for long periods of time for a number of reasons. Some drivers are subject to mandatory rest periods and engines are idled to maintain cabin comfort. Others have refrigeration units that operate off the main engine, requiring it to run even when the truck is stationary. Idling trucks burn as much as one gallon of fuel per hour and emit high levels of particulate and smog forming emissions that impact the health of our citizens and our environment.

The advent of idle reduction technology in recent years has made much of this idling avoidable. However, idle reduction units typically add several hundred pounds to the weight of a vehicle. Under current New Hampshire law up to 400 pounds of this additional weight is exempt from inclusion in the weight limit of the vehicle. The recent federal MAP-21 (Moving Ahead for Progress in the 21st Century) authorization modified the Code of Federal Regulations, Title 23, Part 658.17 to increase the weight of idle reduction units to be exempted from the vehicle weight on the National System of Interstate and Defense Highway to 550 pounds.

In New Hampshire, heavy duty trucks account for a disproportionate percentage of the state's particulate and smog forming pollutants. As a relatively rural state, a stationary infrastructure that would allow long haul truckers to turn off their vehicles during their mandatory rest stops, such as electrified truck stops, has not offered a good

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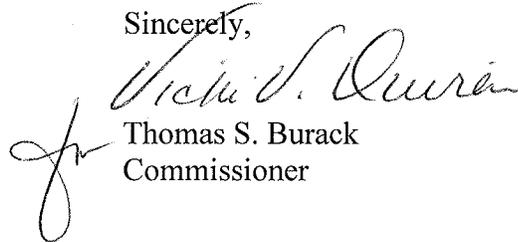
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economic return for facility owners and therefore has not been developed. Additionally, many truckers take their rest periods at locations other than commercial truck stops. On-board idle reduction technology allows truckers operating anywhere in the state to reduce idling, thereby saving fuel and reducing air pollution.

Currently, five New England states allow additional weight for idle reduction technology either through state statute or state policy at the level consistent with federal law. Many other Northeast states (e.g. New York, Pennsylvania, Delaware, Maryland, Virginia) also allow for this weight exemption.

We urge you to harmonize the weight exemption to match current federal law and pass this legislation because it will help create certainty for the trucking industry and encourage investment in idle reduction technology, thereby reducing diesel engine emissions, conserving fuel, and saving money that can be reinvested in the economy. Should you have further questions or need additional information please feel free to contact me (271-2958, Thomas.burack@des.nh.gov) or Rebecca Ohler (271-6749, rebecca.ohler@des.nh.gov).

Sincerely,



Thomas S. Burack
Commissioner

cc: Sponsors
Commissioner John Barthelmes, DOS
Asst. Commission Earl Sweeney, DOS